

EXHIBIT L
PLAINTIFF'S VERDICT FORM

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Midas Green Technologies, LLC,

Plaintiff,

- vs. -

Rhodium Enterprises, Inc.;
Rhodium Technologies LLC;
Rhodium 10mw LLC;
Rhodium 2.0 LLC;
Rhodium 30mw LLC;
Rhodium Encore LLC;
Rhodium Renewables LLC;

Defendants.

Civil Action No. 6:22-cv-00050-ADA

Jury Trial Demanded

PLAINTIFF PROPOSED VERDICTS OF TRIAL

We the Jury in the above-entitled case, answer the questions submitted to us as follows:

Infringement

Question 1A:

Has Midas proven by a preponderance of the evidence that Rhodium made, had made, or used a product that contains each element of Claim 1 of the ‘457 Patent?

Claim 1	Yes ____	No ____
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If you answered “Yes”, then proceed to Question 1B (immediately below).

If you answered “No”, then proceed to Question 3A.

Question 1B:

Has Midas proven by a preponderance of the evidence that Rhodium made, had made, or used a product that contains each element of Claim 5 of the ‘457 Patent?

Claim 5	Yes ____	No ____
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Proceed to Question 2 (next page).

Question 2:

Has Midas proven by a preponderance of the evidence that Rhodium's infringement was willful?

Claim 1	Yes ____	No ____
Claim 5	Yes ____	No ____

Proceed to Question 3A (next page).

Invalidity & Enforceability

Question 3A:

Has Rhodium proven by clear and convincing evidence that Claim 1 of the ‘457 Patent was “anticipated” or, in other words, not “new”?

Claim 1	Yes ____	No ____
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If you Answered “Yes”, then proceed to Question 3B (immediately below).

If you Answer “No” then proceed Question 4 (next page).

Question 3B:

Has Rhodium proven by clear and convincing evidence that Claim 5 of the ‘457 Patent was “anticipated” or, in other words, not “new”?

Claim 5	Yes ____	No ____
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If you Answered “Yes”, then proceed to page 10 of this verdict form.

If you Answer “No”, then proceed Question 4 (next page).

Inequitable Conduct

Question 4:

Has Rhodium proven by clear and convincing evidence that the applicants for the ‘457 Patent withheld material information or submitted materially false information or statements to the Patent Office?

Yes ____	No ____
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Proceed to Question 5 (next page).

Question 5:

Has Rhodium proven by clear and convincing evidence that the applicants for the ‘457 Patent knowingly failed to disclose material information and/or false or misleading statements with an intent to deceive the Examiner?

Yes ____	No ____
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Proceed to Question 6A (next page)

Damages

Question 6A:

Does Rhodium owe Midas Lost Profit Damages?

Yes ____	No ____
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If you answered “Yes”, then proceed to Question 6B (immediately below).

If you answered “No”, then proceed to Question 7A (next page).

Question 6B:

What is the amount of Lost Profits that Rhodium owes Midas?

\$ _____

Proceed to Question 7A (next page).

Question 7A:

Does Rhodium owe Midas Reasonable Royalty Damages?

Yes ____	No ____
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If you answered “Yes”, then proceed to Question 7B (immediately below).

If you answered “No”, then proceed to Question 8 (next page).

Question 7B:

What is the amount of Reasonable Royalty that Rhodium owes Midas?

\$ _____

Proceed to Question 8 (next page).

Question 8:

What is the total amount that Midas is owed from Rhodium? Enter the larger of the amounts you entered in response to Questions 6B and 7B. If the amounts are the same in 6B and 7B, then enter that amount.

\$ _____

Proceed to page 10 of the verdict form.

You have now reached the end of the verdict form and should review it to ensure that it accurately reflects your unanimous determinations. The jury foreperson should sign and date the verdict form below and notify the Court that you have reached a verdict.

Dated: _____

Signed by Jury Foreperson: _____